

KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

Javier H. Rubinstein, P.C.
To Call Writer Directly:
(312) 862-3220
javier.rubinstein@kirkland.com

300 North LaSalle
Chicago, IL 60654

(312) 862-2000

www.kirkland.com

Facsimile:
(312) 862-2200

October 2, 2018

By ECF

Hon. Edgardo Ramos
United States District Judge
United States District Court, Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *In re Application of Antonio del Valle Ruiz, et al.*, No. 18 Misc. 85 (ER)

Dear Judge Ramos:

Petitioners write to respectfully request a status conference concerning their application for discovery pursuant to 28 U.S.C. § 1782, filed March 6, 2018 (Docket Entry No. 1).

We acknowledge that there is no specific deadline for a ruling, and recognize this Court's heavy docket. However, as explained below, due to upcoming deadlines in the foreign proceedings for which Petitioners seek discovery, Petitioners have an urgent need for the documents they are seeking, and thus would be grateful for the opportunity to have a status conference with the Court regarding their application.

In the proceedings before the Court of Justice of the European Union (CJEU), petitioners' Reply Submission is due on October 31, 2018. Under the CJEU's rules of procedure, the Reply Submission is the last opportunity for the Petitioners to provide their evidence to the court (absent leave of court). Additionally, Petitioners anticipate that their opening submissions in both ongoing arbitrations will be due in the coming months. Pursuant to the applicable rules, Petitioners will need to include with their opening submissions on the merits the evidence that they intend to rely upon. Therefore, petitioners have a pressing need for the discovery requested in their application as the time frames for submitting such discovery information as evidence in the foreign proceedings are rapidly approaching.

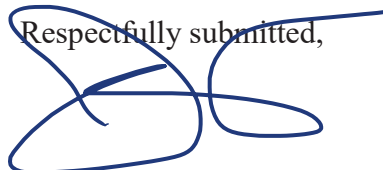
In light of these upcoming deadlines in the foreign proceedings, Petitioners respectfully request a status conference at the Court's earliest opportunity.

KIRKLAND & ELLIS LLP

Hon. Edgardo Ramos
October 2, 2018
Page 2

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, consisting of a large, stylized 'J' followed by a horizontal line and a loop.

Javier H. Rubinstein, P.C.

cc: All counsel of record in No. 18 Misc. 85, via ECF